

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,

ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,

ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,

ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD

FEDERATION OF AMERICA, INC.,

PLANNED PARENTHOOD GULF

COAST, INC., PLANNED

PARENTHOOD OF GREATER

TEXAS, INC., PLANNED

PARENTHOOD SOUTH

TEXAS, INC., PLANNED

PARENTHOOD CAMERON

COUNTY, INC., PLANNED

PARENTHOOD SAN ANTONIO,

INC.,

Defendants.

**REPLY IN SUPPORT OF RELATOR’S JOINDER IN LOUISIANA’S
MOTIONS FOR PROTECTIVE ORDER**

Relator files this brief reply to reiterate Relator's joinder in LDH's request that the Court grant LDH's requested protective orders. Relator already explained that there was no agreement between the parties to broadly extend the discovery schedule. And the Court's order granting Defendants' motion to quash the deposition of

Melaney Linton cannot be construed as granting an extension of the schedule. Dkt. 293. Relator further notes that Defendants appear to be trying to use this to obtain a wholesale extension of the discovery period, as they have continued to attempt to serve additional discovery requests, disclosures, and produce documents after the discovery cutoff. Allowing an extension of the schedule now will thus prejudice Relator and the State, who complied with the Court's order and schedule.

It is Defendants' responsibility ensure that subpoenas to a third party are properly served. Defendants' failure to do so and to timely correct the problem should not open the door to extend the discovery deadline and allow for Defendants' other late efforts at discovery.

CONCLUSION

The Court should grant LDH's motions for protective order and decline to extend the discovery deadline.

Respectfully submitted.

/s/ Heather Gebelin Hacker

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CERTIFICATE OF SERVICE

I hereby certify that on December 6, 2022, this document was electronically filed and served via the Court's CM/ECF system.

/s/ Heather Gebelin Hacker
Heather Gebelin Hacker